

LNE 4.29.25  
PCM: 2025R00174

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

JOKOLBY COOPER,

Defendant.

CRIMINAL NO. JRR 25cr 135

(Possession of a Firearm and  
Ammunition by a Prohibited Person,  
18 U.S.C. § 922(g)(1); Forfeiture, 18  
U.S.C. § 924(d), 21 U.S.C. § 853(p),  
28 U.S.C. § 2461(c))

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INDICTMENT

COUNT ONE

(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about December 23, 2024, in the District of Maryland, the Defendant,

**JOKOLBY COOPER,**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms and ammunition, to wit, a Polymer 80, model PF940SC, .40 caliber pistol without a serial number; and five rounds of .40 caliber ammunition; and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)(1)

**FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the Defendant's conviction under the offenses charged in Count One of this Indictment.

**Firearms and Ammunition Forfeiture**

2. Upon conviction of the offense alleged in Count One of this Indictment, the Defendant,

**JOKOLBY COOPER,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the offense, including, but not limited to:

- a. a Polymer 80, model PF940SC, .40 caliber pistol bearing no serial number;  
and
- b. approximately five (5) rounds of .40 caliber ammunition.

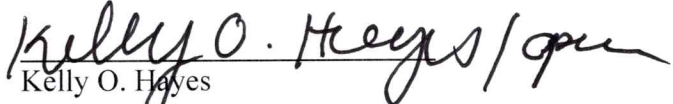
**Substitute Assets**

3. If, as a result of any act or omission of the Defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

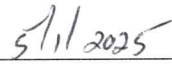
18 U.S.C. § 924(d)  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)

  
Kelly O. Hayes  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

Foreperson

  
Date